

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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| IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION | MDL No. 2875 HON. ROBERT B. KUGLER |
| THIS DOCUMENT RELATES TO ALL CASES | |

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: John P. Lavelle, Jr., Esq.
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103

Attorneys for Defendants

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition via Zoom, of William J. Lambert, on March 8, 2022, at 9:30 a.m. eastern time, and continuing until completion, at Morgan, Lewis & Bockius LLP, 1701 Market Street, Philadelphia, PA 19103, via Zoom. The witness shall produce the documents requested at Exhibit A, attached hereto, at least two days in advance of the deposition, to the extent not already served upon Plaintiffs.

TAKING ATTORNEY FOR PLAINTIFFS:

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The videotaped deposition will be taken via Zoom before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

March 1, 2022

PLAINTIFF'S COUNSEL

By: /s/ Marlene J. Goldenberg
Marlene J. Goldenberg
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EXHIBIT A

DOCUMENT REQUESTS

- 1) Copies of all invoices for work performed in connection with any consultation or expert work performed for or on behalf of any defendant or their counsel with regard to any issues in this MDL, including but not limited to for the review of documents, review and consultation with regard to plaintiff experts, preparation of Dr. Lambert's reports, and preparation for deposition or trial. Note: If the witness does not have up to date invoices, the witness is requested to be prepared to orally provide the dates, time amounts, and subject matter of all such work.
- 2) A list of all individuals responsible for performing work and/or testing which formed part of the report or a basis for any contents of the report.
- 3) Documents showing all contacts between you and the US FDA regarding any sartan medication and/or nitrosamine.
- 4) Copies of any notes, i.e., written or electronic, reflecting any consulting or litigation work related to this MDL, whether or not documented in invoices.
- 5) Copies of any notes or other documentation, including PowerPoints, for any presentations, seminars, or classes, given by Dr. Lambert with regard to risks and benefits of any angiotensin II receptor blockers or nitrosamines.
- 6) Copies of any notes or other documentation, including PowerPoints, for any presentations, seminars, or classes, given by Dr. Lambert with regard to medical monitoring for any purpose, including but not limited to with regard to any health effects from exposure to any nitrosamines.
- 7) Copies of any documents or articles relied upon for the opinions set forth in the reports served in this MDL, whether or not listed in the report.
- 8) Copies of any documents or articles reviewed in connection with the report served, whether or not listed in the report or attachments thereto.
- 9) Any illustrations, PowerPoints, images, charts, tables, or demonstrative exhibits that may be used by or with Dr. Lambert in connection with a Daubert hearing or trial testimony in this litigation.
- 10) Documentation of any research grant the witness has been provided to study any angiotensin II receptor blockers, or nitrosamines, or health effects potentially related thereto.
- 11) Documentation of any research the witness has performed with regard to any angiotensin II receptor blockers, or nitrosamines, or health effects potentially related thereto.

- 12) Copies of any documents including protocols or information about medication side effects, in the possession of or reviewed by the witness, which set forth information related to the risks and benefits, or medical monitoring, with regard to any substance, including of any angiotensin II receptor blockers or nitrosamines.
- 13) Any documents or other communications the witness has received from any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, and/or medical monitoring as to the potential risks thereof, outside of information provided by counsel who retained the witness.
- 14) Any communications from the witness to any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, and/or medical monitoring as to the potential risks thereof, outside of communications to counsel who retained the witness.
- 15) Any textbook referenced by the witness in forming his opinions.
- 16) Documentation of any work performed for or on behalf of any defendant manufacturer and/or defense law firm, in this MDL, at any time.